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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re:	§	
	§	
	§	
SQRL SERVICE STATIONS LLC,	§	Case No. 24-32457-mvl7
	§	
Debtor.	§	
	§	

**MOTION TO SELL
ESTATE'S INTEREST IN LITIGATION CLAIMS**

Anne Elizabeth Burns, Chapter 7 Trustee ("Trustee") in this bankruptcy case, moves the Court pursuant to 11 U.S.C. § 363(b) for approval of the sale of the estate's interest, if any, in certain alleged litigation claims and would respectfully show the Court as follows:

1. On August 16, 2024, SQRL Service Stations LLC ("Debtor") filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code.
2. Anne Elizabeth Burns was appointed Chapter 11 Trustee on November 4, 2024.
3. The case was converted to Chapter 7 on December 17, 2024, and Anne Elizabeth Burns was appointed Chapter 7 Trustee.

4. In response to Question 74 on the the Debtor's Schedule A [Docket No. 52] the Debtor stated: "There are fraudulent transfers, avoidance actions, and fraud claims against Blake Smith and other. Investigation is ongoing."

5. BZ Mart, LLC, has offered to purchase from the Trustee any and all claims owned by the bankruptcy estate which the Debtor may have against Blue Owl Real Estate Capital LLC ("Claims Against Blue Owl") and/or Cameron Property Company, LLC. ("Claims Against Cameron").

6. The purchase price offered is \$10,000 for any Claims Against Blue Owl and an additional \$10,000 for any Claims Against Cameron.

7. Attached as Exhibit A is the Purchase and Sale Agreement.

8. BZ Mart, LLC, is owned or controlled by Jamal Hizam, who is an insider of the Debtor SQRL Service Stations, Inc.

9. The Trustee believes that any claims owned by the estate against either entity are speculative, highly contentious, and costly to litigate.

10. Unless the Trustee can realize some value through purchase (or settlement) of these alleged litigation claims, the Trustee will likely abandon them from the estate.

11. IF BLUE OWL, CAMERON (OR ANYONE ELSE) WISHES TO PURCHASE THESE CLAIMS, THEY ARE INVITED TO BID AGAINST BZ MART, INC. TO PURCHASE THE ESTATE'S INTEREST IN THE CLAIMS ON THE SAME TERMS AS OFFERED TO BZ MART, INC. PER THE "HIGHER CASH BIDS" PROCEDURE SET FORTH BELOW.

HIGHER CASH BIDS

12. If any party wishes to make a higher cash offer for the bankruptcy estate's interest in the Claims Against Blue Owl or the bankruptcy estate's interest in the Claims Against Cameron, the Trustee will entertain higher cash bids under the following terms:

- A. A higher cash offer must be at least **\$15,000 per entity** under the same terms—no warranty of any kind, including that the estate even has any such claims.
- B. Any offer must be made by filling out the **Offer to Purchase Claims** form, a copy of which is attached hereto as Exhibit B.
- C. An Offer to Purchase Claims must be delivered to the Trustee at 900 Jackson Street, Suite 570, Dallas, Texas 75202 along with a cashier's check for \$15,000 per entity made payable to Anne Elizabeth Burns, Trustee. The deposit will serve as a cash deposit to be applied to the payment of the ultimate purchase price for the claims purchased if such offer becomes the winning bid.
- D. Both the Offer to Purchase Claims and deposit must be received by the Trustee by **5:00 PM Dallas time Monday, March 31, 2025.**
- E. Any party who submits a timely offer and makes a timely deposit will receive instructions for participating in an auction to be held via Zoom on a later date and time.
- F. At the Auction, the opening bid will be the highest offer timely received by the Trustee and the Trustee will accept higher bids in increments of at least \$5,000 per entity. At the conclusion of the Auction the highest

bidder will be declared and will be required to deliver any additional overbid to the Trustee within 48 hours of the close of the auction.

- G. After bankruptcy court approval, all unsuccessful bidders shall receive the return of their deposit without deduction.

WHEREFORE, the Trustee prays for the approval of the sale of any claims under the terms set forth above and for such other and further relief to which the Trustee may be entitled.

Respectfully submitted,

/s/ Charles B. Hendricks
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